

FOLLOW-UP TO PLANNING COMMISSION QUESTIONS AND CONCERNS  
(29 May 2015)

During the May 13, 2015 Planning Commission public hearing on the proposed indoor firing range (UP-861-15), the Planning Commission posed a number of questions that the Applicant was at that time unable to answer. The Applicant has worked with its range consultants to review and address these questions, and offers the below summary for the Board's review and consideration:

1. Is there a State or Federal agency that, upon completion of range construction, certifies the facility as meeting Federal or State regulations? *There are no specific regulations promulgated by the federal or state government for firing ranges. Accordingly, there is no agency that provides construction certification at the state or federal level. A number of private organizations, such as the National Rifle Association, and various government agencies have developed best practice manuals of appropriate operation and safety policies for ranges. The Applicant intends to develop such a policy manual for this range.*
2. Is there a Federal or State agency that periodically inspects the air quality and lead management within the facility? *No. OSHA has the authority to inspect a firing range for particulate concentrations of lead dust above maximum contaminant levels (MCL), but has not done so as a regular practice. OSHA inspections of this nature would typically occur in response to a complaint. Protocols for periodic range cleaning that include sampling for lead concentrations as part of a written operations policy document, which is kept up to date together with good records of sampling results are the industry best management practice for this issue. The MCL for lead in ranges is primarily focused on range employees because users of the range do not spend enough time in the range to exceed maximum exposure levels.*
3. Does the ATF inspect the facilities, from time to time or on any regular schedule? *The ATF does not have the authority to conduct range inspections. Firearm sales require a license from ATF and the ATF can be expected to conduct periodic inspections of firearm sales records and documentation.*
4. What security measures, particularly after operating hours, are planned for the facility? *Security during operating hours is achieved by a combination of design features and protocols that prevent unauthorized access to restricted areas. Additionally, all staff working at indoor firing ranges are typically armed and highly trained in firearm use, which has proven to be an effective deterrent to crime at such facilities. Robust off-hours facility security is achieved through building perimeter design features (reinforced doors, windows, security systems and alarms) that are similar to security precautions associated with any high value target of theft or mischief. The Applicant will have a substantial investment in the various products and features inside the facility and will be taking all necessary precautions to protect its investment.*
5. There was general discussion of noise associated with the indoor range. *The range design and construction consultant has offered that ambient noise levels outside the structure are fully expected to be higher than any noise emanating from within the structure. The County Code requires that "The range shall be designed so that no range noise is audible at the property line. Documentation certified by an architect and professional engineer to this effect shall be submitted with site and building plans." The range consultant has assured the Applicant that typical noise mitigation materials, practices and procedures will be sufficient to satisfy the Code requirement.*